

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

LAWRENCE HARTFORD; DOUGLAS
MITCHELL; BRETT BASS; SPORTING
SYSTEMS VANCOUVER, INC.; SECOND
AMENDMENT FOUNDATION, INC.; AND
FIREARMS POLICY COALITION, INC.,

Plaintiffs,

v.

BOB FERGUSON, in his official capacity as
Washington State Attorney General, et al.,

Defendants.

NO. 3:23-cv-05364-RJB

STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
ANSWER

I. STIPULATION

The Parties, by and through their respective attorneys of record, hereby stipulate to the following:

1. Under Federal Rule of Civil Procedure 12(a) Defendants' answers are due 21 days after service of the Complaint, or 60 days if the Defendants timely waived service under Rule 4(d) after the request for a waiver was sent.

2. Plaintiffs have filed a motion for a preliminary injunction (ECF No. 10).

3. It would not prejudice Plaintiffs to extend Defendants' deadline to respond until after the Motion for Preliminary Injunction is heard by this Court. Accordingly, the Parties

1 stipulate that Defendants and proposed Intervenor-Defendant Alliance for Gun Responsibility
 2 may answer, or otherwise respond to Plaintiffs' complaint, no later than 21 calendar days after
 3 (1) service is completed or (2) the date on which Plaintiffs' Motion for Preliminary Injunction is
 4 ruled on by this Court, whichever is later. To the extent, any of the Defendants timely waived
 5 service under Fed. R. Civ. P. 4(d), those Defendants may answer, or otherwise response to
 6 Plaintiffs' complaint, no later than (1) 60 calendar days after the request for waiver was sent or
 7 (2) 21 days from the date on which Plaintiffs' Motion for Preliminary Injunction is ruled on by
 8 this Court, whichever is later.

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 10 DATED this 16th day of May, 2023.

11 ROBERT W. FERGUSON
 12 Attorney General

13 s/ Andrew R.W. Hughes

14 ANDREW R.W. HUGHES, WSBA #49515
 15 R. JULY SIMPSON, WSBA #45869
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 17 Assistant Attorneys General
 18 Attorneys for State Defendants

19 JASON J. CUMMINGS
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21 s/ Lyndsey M. Downs

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 24 Deputy Prosecuting Attorneys
 25 Attorneys for Snohomish County Defendants
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1 TONY GOLIK
2 Clark County Prosecuting Attorney

3 s/ Leslie A. Lopez
4 Leslie A. Lopez, WSBA #46118
5 Chief Civil Deputy Prosecuting Attorney

6 s/ Amanda Migchelbrink
7 Amanda M. Migchelbrink, WSBA #34223
8 Senior Deputy Prosecuting Attorney

9 *Attorneys for Defendants, John Horch and Tony Golik*

10 PACIFICA LAW GROUP LLP

11 s/ Kai A. Smith
12 Zachary J. Pekelis, WSBA #44557
13 Kai A. Smith, WSBA #54749
14 *Attorneys for Proposed Intervenor-Defendant Alliance for Gun Responsibility*

15 ARD LAW GROUP PLLC

16 s/ Joel B. Ard
17 JOEL B. ARD, WSBA #40104
18 *Attorney for Plaintiffs*

19 CHAD M. ENRIGHT
20 Kitsap County Prosecuting Attorney

21 s/ Christine Palmer
22 CHRISTINE PALMER, WSBA #42560
23 Senior Deputy Prosecuting Attorney
24 *Attorney for Defendants Chad M. Enright & John Gese*

1 **II. ORDER**

2 **IT IS HEREBY ORDERED:**

3 That the stipulation of the Parties is APPROVED AND ADOPTED. Defendants' and
 4 proposed Intervenor-Defendant Alliance for Gun Responsibility's deadline for responding to
 5 Plaintiffs' Complaint (Dkt. # 1) under Federal Rule of Civil Procedure 12 is extended to no later
 6 than 21 calendar days after (1) service is completed or (2) the date on which Plaintiffs' Motion
 7 for Preliminary Injunction is ruled on by this Court, whichever is later. To the extent, any of the
 8 Defendants timely waived service under Fed. R. Civ. P. 4(d), those Defendants may answer, or
 9 otherwise response to Plaintiffs' complaint, no later than (1) 60 calendar days after the request
 10 for waiver was sent or (2) 21 days from the date on which Plaintiffs' Motion for Preliminary
 11 Injunction is ruled on by this Court, whichever is later.

12
 13 DATED this ____ day of _____, 2023.

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 15 _____
 16 The Honorable Robert J. Bryan
 17 United States District Judge
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DECLARATION OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 16th day of May, 2023, at Seattle, Washington.

s/ Andrew R.W. Hughes

ANDREW R.W. HUGHES, WSBA #49515
Assistant Attorney General